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HUSQVARNA CONSTRUCTION PRODUCTS NORTH AMERICA, INC.

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 GARY FERRAS, an individual,

12 Plaintiff,

13 vs.

14 HUSQVARNA CONSTRUCTION  
PRODUCTS NORTH AMERICA, INC.,  
15 HUSQVARNA NORTH AMERICA,  
HUSQVARNA GROUP, and  
16 DOES 1 through 100, inclusive,

17 Defendants.

Case No.: 4:16-CV-01081-SBA

*[Removed from Contra Costa County Superior Court, Civil Case No. C16-00131]*

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CHANGE DEADLINE TO  
FILE JOINT CASE MANAGEMENT  
CONFERENCE STATEMENT**

**[Local Rule 6-2]**

Date: June 1, 2016  
Time: 2:30 p.m.

Complaint Filed: January 25, 2016  
Removal Date: March 4, 2016  
Trial Date: None

20  
21 **STIPULATION**

22 Pursuant to Local Rule 6-2, the parties hereby submit this Stipulation and [Proposed]  
23 Order to change the deadline in which to file the Joint Case Management Statement of Plaintiff  
24 Gary Ferras ("Plaintiff") and Defendant Husqvarna Construction Products North America, Inc.  
25 ("Defendant"). The initial case management conference in this action is currently scheduled for  
26 June 1, 2016, at 2:30 p.m., and the deadline for the parties to file a joint case management  
27 statement is May 25, 2016.

Case No.: 4:16-CV-01081-SBA

1 WHEREAS, the parties have been meeting and conferring to finalize a written joint case  
2 management statement to submit to the Court.

3 WHEREAS, on May 25, 2016, Plaintiff Gary Ferras' counsel, Mr. Alan Cohen, suffered  
4 a medical emergency;

5 WHEREAS, Mr. Cohen has requested and, counsel for Defendant agrees, that to allow  
6 Mr. Cohen to attend to his medical emergency and sufficient time to review the joint case  
7 management statement the parties have been working on, the deadline to file the parties' Joint  
8 Case Management Statement should be extended by two days to May 27, 2016.

9 NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

10 1. The deadline for deadline for Plaintiff and Defendant to file their joint case manage  
11 statement is extended by two days to May 27, 2016.

12 **SO STIPULATED.**

13  
14 DATED: May 25, 2016

Respectfully submitted,  
FISHER & PHILLIPS LLP

15 By: /s/ Juan C. Araneda  
16 Jason A. Geller  
17 Juan C. Araneda  
18 Attorneys for Defendant  
HUSQVARNA CONSTRUCTION  
PRODUCTS NORTH AMERICA, INC.

19 DATED: May 25, 2016

LAW OFFICES OF ALAN F. COHEN

20 By: /s/ Alan F. Cohen  
21 Alan F. Cohen  
22 Attorneys for Plaintiff  
23 GARY FERRAS  
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**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

The Court, having read and considered the parties' Stipulation to Change Deadline To File Joint Case Management Conference Statement, and finding good cause in support thereof, hereby orders that the deadline for the parties to file their joint case management conference statement is extended as by two days to May 27, 2016.

DATED: May 27, 2016



HON. SAUNDRA B. ARMSTRONG  
UNITED STATES DISTRICT JUDGE

**DECLARATION OF CONSENT**

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above-listed counsel for Plaintiff Gary Ferras.

DATED: May 25, 2016

/s/Juan C. Araneda  
Juan C. Araneda